

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

IN RE:) CASE NO. 18-10810
)
CHRISTOPHER ADAM VARGA) CHAPTER 13 PROCEEDINGS
)
Debtor.) JUDGE ARTHUR I. HARRIS
)

MOTION TO INCUR DEBT TO PURCHASE VEHICLE

Now comes Debtor, Christopher Adam Varga, by and through the undersigned counsel, and pursuant to Amended Administrative Order 98-1, hereby moves this Honorable Court for an order authorizing the incurrence of debt to purchase a new vehicle.

1. The purchase will be financed and paid outside of the plan. The payments will be between approximately \$300 and \$400 per month.
2. The reason for said purchase is that the debtor's current vehicle has been totaled and that Debtor requires a replacement vehicle in order to transport himself to and from work.
3. There is no unusual connection between the lender and the Debtor.

WHEREFORE, Debtor prays this Court grant Debtor's motion, enter an order authorizing Debtor to enter into the financing transaction set forth herein to purchase a vehicle, and grant such other relief as this Court deems appropriate.

Respectfully submitted,

/s/ Cory R. Hinton, Esq.

Cory R. Hinton, Esq. (0085668)
8570 Mentor Ave.
Mentor, OH 44060
(440)255-7711
(440)255-3806-Fax
chinton@rghk.com

CERTIFICATE OF SERVICE

A copy of the foregoing Motion to Incur Debt to Purchase Vehicle was served electronically and/or by regular U.S. Mail, postage prepaid, on this 13th day of September, 2021.

Debtor

Christopher Adam Varga
32936 Pennsylvania Dr.
North Ridgeville, OH 44039

Creditors

(See attached list)

Trustee

Lauren A. Helbling
Chapter 13 Trustee
(Via Electronic Service)

/s/ Cory R. Hinton, Esq.

Cory R. Hinton, Esq.

ACE Cash Express
1231 Greenway Drive, Suite 700
Irving, TX 75038

ARS National Services, Inc.
P.O. Box 463023
Escondido, CA 92046-3023

AT&T
AFLN, Inc.
PO Bos 3097
Bloomington, IL 61702

Big Lots Rent to Own
Progressive Leasing
256 West Data Dr.
Draper, UT 84020

Capital Management Services, LP
698 1/2 South Ogden Street
Buffalo, NY 14206-2317

Capital One
P.O. Box 30281
Salt Lake City, UT 84130

Cash Net USA
175 West Jackson
Suite 1000
Chicago, IL 60604

Department of the Treasury
Internal Revenue Service
Kansas City, MO 64999-0025

Discover Bank
P.O. Box 15316
Wilmington, DE 19850

Discover Student Loans
PO Box 30948
Salt Lake City, UT 84130

Eagle Loan
633 Chestnut Commons Dr.
Elyria, OH 44035

Erie Auto Insurance
Erie Insurnace Group
Erie, PA 16530

Fed Loan Servicing Credit
P.O. Box 60610
Harrisburg, PA 17106-0610

First Energy Claims Dept.
76 South Main Street
Akron, OH 44308

First Premier
3820 N. Louise Ave
Tape Only
Sioux Falls, SD 57107-0145

Home Depot
Home Deport Credit Services
P.O. Box 790328
Saint Louis, MO 63179

Huntington National Bank
P.O. Box 1558
Columbus, OH 43216

Jeannie Paschal
34012 Gregory Ave.
North Ridgeville, OH 44039

Lendmark/Integrated Recovery Serv.
3840 East Robinson Rd., #224
Buffalo, NY 14228

Maria Wingert
15904 Alden Ave.
Cleveland, OH 44111

Maureen Nagle
2707 Jaycox Rd.
Avon, OH 44011

Maxland
P.O. Box 639
Parshall, ND 58770

Midland Credit Mgmt, Inc.
2365 Northside Dr., Suite 300
San Diego, CA 92108-2709

Portfolio Recovery Assoc
Riverside Commerce Center
120 Corporate Blvd, Suite 100
Norfolk, VA 23502-4962

Purchasing Power
1349 West Peachtree St. Northwest
#1100
Atlanta, GA 30309

Regional Income Tax Agency
P.O. Box 94951
Cleveland, OH 44101-4951

Rick Paschal
34012 Gregory Ave.
North Ridgeville, OH 44039

Sears Why Not Lease It
1750 Elm St.
Suite 1200
Manchester, NH 03104

SLC Student Loan Trust
P.O. Box 30948
Salt Lake City, UT 84130-0948

Sprint
Sprint Legal Dept.
PO Box 4600
Reston, VA 20195

State of Ohio Attorney General
PO Box 165009
Columbus, OH 43216

THD/CBNA
P.O. Box 6497
Sioux Falls, SD 57117-6497

Time Warner/Spectrum
IC Systems Inc.
PO Box 64378
Saint Paul, MN 55164

Vincent A. Lewis
18 W. Monument Ave.
Dayton, OH 45402

Wells Fargo Dealer Services
P.O. Box 1697
Winterville, NC 28590

Weltman, Weinberg & Reis Co., LPA
c/o Ted Traut
323 W.Lakeside Ave., Suite 200
Cleveland, OH 44113-1009